

JUDGE DAVID GUADERRAMA

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

2020 FEB -6 PM 2: 04

UNITED STATES OF AMERICA,

Plaintiff,

v.

PATRICK WOOD CRUSIUS,

Defendant.

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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: JB DEPUTY

CRIMINAL NO. EP-20-CR-\_\_\_\_\_

**EP20CR0389**

**GOVERNMENT'S MOTION TO DETAIN DEFENDANT  
WITHOUT BOND AND MOTION FOR CONTINUANCE**

The United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show the following:

1. The Defendant has been charged by Indictment with a violation of Title 18, United States Code, Section 249(a)(2), *Hate Crime Resulting in Death*; Title 18, United States Code, Sections 924(c), (j)(1), *Use of a Firearm to Commit Murder During and in Relation to a Crime Violence*; Title 18, United States Code, Section 249(a)(2), *Hate Crime Involving Attempt to Kill*; and Title 18, United States Code, Section 924(c), *Use of a Firearm During and in Relation to a Crime of Violence*.

2. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.

3. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JF Bash', is written over a horizontal line.

JOHN F. BASH  
UNITED STATES ATTORNEY  
WESTERN DISTRICT OF TEXAS